

December 30, 1997

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The Honorable Dan Glickman
Secretary of Agriculture
U.S. Department of Agriculture
14th Street and Independence Avenue, S.W.
Washington, D.C. 20250

The Honorable Donna Shalala
Secretary of Health and Human Services
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Glickman and Secretary Shalala:

We, the undersigned organizations, share the goal of the President's initiative to provide for a safe and abundant supply of fresh fruits and vegetables.

Through increased research and efforts to educate people along the farm to table pathway, we believe the President's initiative can benefit the nation's consumers and those who grow, ship and handle produce. All of our organizations have taken steps to identify the key microbiological risk issues relevant to our respective members and the appropriate responses to minimize these risks. We appreciate the opportunity provided to our organizations to participate in and comment on the development of the President's initiative. If the initiative moves ahead based upon sound science and in a deliberate fashion, avoiding unnecessary haste, then we believe the initiative can complement industry's efforts.

Unfortunately, several aspects of the Food and Drug Administration's working draft produce guidance document (dated November 25, 1997) cause us concern. Among the undersigned there exists a range of views as to the effectiveness and public health value of some portions of the draft FDA guidance document. We want to work closely with your respective departments to develop guidance that is both effective and meaningful. Clearly, any guidance which imposes burdens upon the industry and raises the cost of fruits and vegetables without providing distinct public health benefits cannot be considered a success.

In addition, after hearing comments during the regional grassroots meetings, and based upon conversations with Administration officials, we have determined that we must oppose the development of commodity specific guidance. Prescriptive

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December 30, 1997

Page 2

guidance on how to grow, handle and distribute specific produce commodities would be impractical to develop and counterproductive. We would anticipate that properly constructed broad industry guidance would identify significant risk factors that may give rise to microbiological hazards in produce and provide growers, shippers and handlers a menu of possible responses to address those hazards, where likely to occur. Devising commodity specific guidance is one option, but we believe this option is fraught with problems and ill considered.

We know of no significant microbiological food safety issues that cannot be properly addressed through a broad industry guidance document and which must be addressed through commodity specific guidance. Moreover, changes in produce growing, harvesting and handling practices are highly dynamic and happen in response to a complex web of interaction occurring among industry operators, government and university researchers, and as a result of innovations introduced by those who provide services and supplies to our industry. We are skeptical that FDA (or any other institution) has the requisite expertise to develop and properly maintain commodity specific guidance intended to apply to many different areas of the country and a wide variety of conditions.

Success in rendering broad industry guidance meaningful at a commodity specific level hinges upon involving people who are credible, knowledgeable and sensitive to the needs of and conditions affecting growers, shippers and handlers. Accordingly, we encourage you to devise a program of education outreach and research founded at the regional, state and local levels. Through the appropriate allocation of resources, the President's initiative can provide focused attention to specific commodities by placing a broad guidance document into the hands of experts and extension personnel working at the regional, state and local levels. A ready universe of experts in the production and handling of commodities reside throughout the Land Grant University system, within state and local governments, and in private sector consulting firms. Also, as you develop and implement the President's initiative recognize that our respective members must comply with a myriad of competing federal and state regulatory requirements: minimizing conflict between these requirements should be a chief goal.

Finally, each of our organizations has worked hard to sensitize and educate our respective members on microbiological food safety issues. We have been pleased by the very interested and eager response of our members who want to minimize microbiological risks. We intend to continue these efforts. Thus, we would welcome

December 30, 1997
Page 3

the opportunity to forge a government-industry partnership to craft a strong, highly visible program of education to promote the continued production, distribution and consumption of safe and nutritious fresh fruits and vegetables.

Thank you for considering our views.

Sincerely,



Thomas E. Stenzel
United Fresh Fruit & Vegetable Association



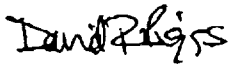
Joel Nelsen
California Citrus Mutual



Paul B. Engler
California Citrus Quality Council



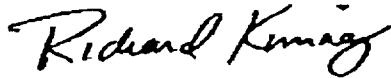
Richard Matoian
California Grape & Tree Fruit League



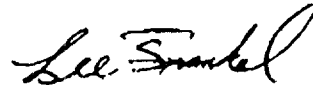
David R. Riggs
California Strawberry Commission



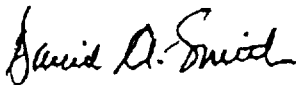
Danny Dempster
The Canadian Horticultural Council /
The Canadian Produce Marketing
Association



Richard Kinney
Florida Citrus Packers



Lee Frankel
Fresh Produce Association of the Americas



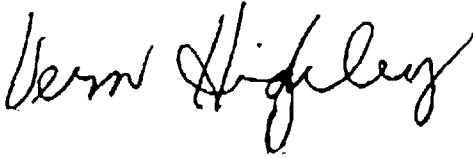
David A. Smith
Idaho Grower Shippers Association



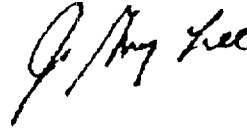
Edith H. Garrett
International Fresh-cut Produce Association

December 30, 1997

Page 4



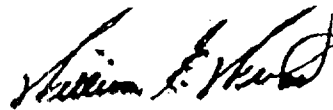
Vern F. Highley
National Watermelon Association, Inc.



J. Gary Lee
North American Perishable Agricultural
Receivers (NAPAR)



Bryan Silberman
Produce Marketing Association



Bill E. Weeks
Texas Produce Association



David L. Moore
Western Growers Association

cc: Richard E. Rominger
Deputy Secretary
Department of Agriculture

Dr. Catherine E. Woteki
Under Secretary for Food Safety
Department of Agriculture

Dr. Michael A. Friedman
Lead Deputy Commissioner
Food and Drug Administration

Dr. Fred R. Shank
Director of Center for Food Safety and Applied Nutrition
Food and Drug Administration